

UPPER COASTAL PLAIN
COUNCIL OF GOVERNMENTS

R04-14-A-049

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WILSON, NORTH CAROLINA 27894

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January 21, 2014

Environmental Management Support, Inc.

Attn: Mr. Don West

8601 Georgia Avenue, Suite 500

Silver Springs, MD 20910

Dear Mr. West:

The Upper Coastal Plain Council of Governments (UCPCOG), a regional governmental agency in North Carolina, is pleased to submit this application to EPA for a Community-wide Assessment Grant.

a. Applicant Identification: Upper Coastal Plain Council of Governments

121 W. Nash Street

PO Box 9

Wilson, NC 27894

b. DUNS number for the UCPCOG: 13-911-5542.

c. Funding Requested:

i. Grant type: Brownfields Assessment Grant

ii. Federal Funds Requested: \$400,000

iii. Contamination: \$200,000 for Hazardous Substances

\$200,000 for Petroleum

iv. Community-wide

d. Location: The UCPCOG Brownfields Coalition Partnership consists of the following 18 towns, cities and counties: Conway, Dortches, Enfield, Garysburg, Littleton, Middlesex, Princeville, Roanoke Rapids, Rocky Mount, Saratoga, Scotland Neck, Speed, Stantonsburg, Weldon, Whitakers, Halifax County, Nash County and Northampton County.

e. Not applicable (this is not a Site Specific proposal)

f. Contacts:

i. Project Director: Joseph Gambaccini

121 W. Nash Street

PO Box 9

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jgambaccini@ucpcog.org

252-234-5966 (p)

252-234-5971 (f)

ii. Chief Executive Officer: Greg T. Godard

121 W. Nash Street

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252-234-5950 (p)

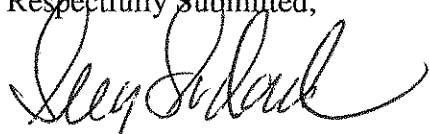
252-234-5971 (f)

- g. Date Submitted: January 22, 2014 via United States Postal Service
- h. Project Period: Three years.
- i. Population:
 - i. The population of the UCPCOG region is 310,416, according to the 2010 U.S Census.
 - ii. The UCPCOG Brownfields Coalition Partnership has 18 member jurisdictions with a 2010 population of 176,728. The population for each jurisdiction is as follows: Conway – 836, Dortches – 935, Enfield – 2,532, Garysburg – 1,057, Littleton – 674, Middlesex – 822, Princeville – 2,082, Roanoke Rapids – 15,754, Rocky Mount – 57,477, Saratoga – 408, Scotland Neck – 2,059, Speed – 80, Stantonsburg – 784, Weldon – 1,655, Whitakers – 744, *Halifax County – 32,017, *Nash County – 36,606, *Northampton County – 20,206.
- * Population figures for the three Brownfields Coalition Partnership counties do not include the population figures of the Brownfields Coalition Partnership towns and cities that are located in each of the three counties.
- j. Other Factors Checklist: Attached to this transmittal letter.

The UCP Brownfields Assessment Program will utilize EPA assessment grant funds to build on the successes of the first two years of its current EPA award. Phase I and Phase II assessments and leveraging of additional resources has led to increased employment opportunities, elimination of slum and blight, and reduced levels of environmental risk. The primary focus of the EPA assessment grant will continue to be along the Interstate 95, US Highway 301 and US 258 corridor areas which connect the larger Brownfields Coalition Partnership member cities including Rocky Mount and Roanoke Rapids to the more remote areas of member counties and towns.

We will continue to focus our efforts on vacant, abandoned properties that have the greatest potential for redevelopment while meeting the needs of the community and reducing environmental risks in neighborhoods potentially impacted by brownfields.

Respectfully Submitted,



Greg Godard, Executive Director
Upper Coastal Plain Council of Governments

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1. Community Need

a. Targeted Community and Brownfields

i. Targeted Community Description

The Upper Coastal Plain (UCP) region, located in eastern North Carolina, consists of five counties: Edgecombe, Halifax, Nash, Northampton and Wilson. The region combines an intricate mix of farmland and forestry with commercial and industrial development particularly in the larger cities. Location has been an advantage given the region's proximity to I-95, I-40, the Research Triangle, the Hampton Roads area of Virginia, and other major transportation routes, including U.S. Routes 64, 264 and 301. However, in recent years, drastic declines in manufacturing industries including textiles and apparel, coupled with a slow-growing and aging population has put a severe strain on the regional economy. Left in the wake of this economic transformation are vacant and dilapidated buildings that were once used for textile mills, lumber production, auto service stations, laundromats and many others. The UCP brownfields program is targeting its efforts in 18 member counties, towns and cities, both urban and rural in nature, and located along the region's major transportation routes.

ii. Demographic Information

As Table 1 shows, the UCP region experienced a 4.3% population increase from 2000-2012, well below the 21.2% state figure. Halifax and Northampton counties experienced declines in their populations (5.9% and 3.0% respectively). Income in the region is also well below state and national levels and continues to increase at a lower rate. The region's poverty rates far exceed those for NC and the US with four of the region's five counties having reached beyond 20%.

Table 1: UCP Region Population, Poverty, Median Household Income

	Population			Poverty			Median Household Income		
	2000	2012	% Point Change	2000	2012	% Point Change	2000	2012	\$ Change
Edgecombe County	55,606	55,954	0.6%	19.6	24.0	4.4	\$30,444	\$33,917	\$3,473
Halifax County	57,370	54,006	-5.9%	21.1	25.3	4.2	\$27,026	\$31,614	\$4,588
Nash County	87,420	95,708	9.5%	12.8	17.6	4.8	\$37,796	\$43,757	\$5,961
Northampton County	22,086	21,428	-3.0%	20.6	26.5	5.9	\$27,438	\$30,911	\$3,473
Wilson County	73,814	81,867	10.9%	15.9	22.8	6.9	\$33,709	\$38,398	\$4,689
UCP Region	296,296	308,963	4.3%	N/A	N/A	N/A	N/A	N/A	N/A
North Carolina	8,046,668	9,752,073	21.2%	11.7	16.8	5.1	\$38,889	\$46,450	\$7,561
USA	281,421,906	313,873,685	11.5%	12.4	14.9	2.5	\$41,994	\$53,046	\$11,052

Source: U.S. Census Bureau, State and County QuickFacts

Table 2 on page 2 details the population by race. Northampton County (58.3%), Edgecombe County (57.6%), and Halifax County (53.2%) are made up primarily of Black or African-Americans. In addition, the Hispanic or Latino ethnic group now makes up 9.8% of the population in Wilson County and 6.5% in Nash County. According to figures from the Comprehensive Economic Development Strategy 2012-2017 the region's African-American population grew by 7,854 people from 2000-2010, followed by the Hispanic ethnic group with an increase of 7,610 people. By comparison, the White population dropped 2,463 during the same 10-year period.

Table 3 on page 2 shows that the annual unemployment rate increased dramatically for all five counties from 2000 to its peak in 2010. All five counties continue to have considerably higher unemployment than NC. At 15.6%, Edgecombe County had the highest unemployment rate for 2010. While annual figures dropped slightly in 2012, jobs in the region are still sorely needed as double-digit unemployment continues to exist in all five counties.

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Table 2: UCP Region Population by Race, 2012

	% White	% Black or African American	% Hispanic or Latino
Edgecombe County	40.4%	57.6%	3.9%
Halifax County	40.9%	53.2%	2.5%
Nash County	58.0%	38.4%	6.5%
Northampton County	39.9%	58.3%	1.7%
Wilson County	57.5%	39.6%	9.8%
North Carolina	71.9%	22.0%	8.7%
USA	77.9%	13.1%	16.9%

Source: U.S Census Bureau. State and County QuickFacts

Table 3: UCP Region Unemployment Rate, 2000-2012

	2000	2005	2010	2012
Edgecombe County	5.9	8.4	15.6	14.7
Halifax County	6.1	7.2	13.2	13.2
Nash County	4.6	6.0	12.3	12.0
Northampton County	5.5	6.7	11.8	11.0
Wilson County	5.6	8.0	12.7	12.5
UCP Region	5.4	7.2	13.1	12.8
North Carolina	3.7	5.3	10.6	9.5
USA	4.0	5.1	9.6	8.1

Source: NC Department of Commerce: Labor & Economic Analysis Division (LEAD)

iii. Brownfields

As a result of the region's poor economic conditions, numerous brownfield sites now exist throughout the region, concentrated along once vibrant commercial corridors and remote, previously prosperous, downtowns. The UCP staff identified over 150 Brownfields sites during a preliminary inventory conducted in 2010. After the addition of Rocky Mount to the brownfields program in 2013, the UCP staff and consultant conducted additional inventory activities along 5 major corridors and added another 266 sites to the inventory. This consolidated inventory includes former textile mills, lumber yards, wood treating facilities, former oil companies, dry cleaners, junk yards, old tobacco warehouses, abandoned gasoline/service stations and manufacturing warehouses. These properties range in size from less than an acre to over a dozen acres. Some recurring examples in the region include once-thriving manufacturing plants that are now vacant and former gasoline/service stations that are abandoned or underutilized. In many cases, property owners have abandoned sites, leaving them prone to disrepair and vandalism and in conditions where redevelopment is perceived as less than cost effective. The real and perceived negative impacts prohibit the needed investment in these areas. Three potential project sites for a new EPA assessment award are outlined in the following table.

Table 4: UCPCOG Brownfields Assessment Program - Potential Project Sites

Site	Size	Past Uses	Potential Contaminants
Scotland Neck Hosiery	3.88 ac.	Manufacturing: hosiery mill	Solvents, petroleum, hazardous substances
Turner Oil (Stantonsburg)	1.0 ac.	Gasoline station and fuel oil	Solvents, petroleum
Exxon Service Station (Saratoga)	0.75 ac.	Auto Service and gasoline	Solvents, petroleum

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iv. Cumulative Environmental Issues

Based on its population, the UCPCOG contains a disproportionately high number of the State's contaminated sites. As of April 2013, the UCPCOG region had 88 inactive hazardous sites on the NC Department of Environment and Natural Resources (NC DENR), Inactive Hazardous Sites Branch, Inventory of Hazardous and Pollutant-Only Sites by County. There are 46 unregulated landfills in the region which is approximately 7% of the total in NC. The region also has 1,962 facilities with an aggregate of approximately 5,705 USTs registered with NC DENR and 1,433 leaking UST sites, which is 3.8% of the total in North Carolina. Lastly, the region has 171 incidents of facilities with leaking above ground storage tanks. These figures do not take into account the hundreds of Brownfields already inventoried that have not been assessed. In addition, the region's major corridors identified above that run through UCPCOG's member communities are also sources of potential air and noise pollution. Lastly, many rural residences still use groundwater as their primary source of drinking water, potentially exposing them to contaminants from nearby Brownfields sites.

b. **Impacts on Targeted Community**

The exodus of textile, warehousing, and gasoline/service station businesses from the region has left many abandoned and vacant facilities. This has resulted in a lack of economic investment and significant blight in these areas. This blight not only includes Brownfields sites, but abandoned and rundown commercial and retail establishments. Grocery stores, health care clinics, and laundromats that typically served the businesses and neighborhoods in these areas have either left or gone out of business. Our current inventory of Brownfields sites revealed that the majority of the targeted Brownfields are located in areas of high poverty with neighborhoods consisting of trailer parks and low-income housing.

Due to the lack of resources and reinvestment in these areas, no environmental data has been collected to assess the actual environmental impacts associated with these Brownfields. However, it is reasonable to assume that leaks and/or emissions at abandoned mills, manufacturing and industrial facilities, and gasoline stations at a minimum have the potential to adversely impact the air, soil, surface water and groundwater in these communities. Exposure to leaks, emissions and asbestos at these type of facilities are known to cause asthma, cancer, liver damage, kidney damage, anemia and circulatory problems. Poverty, unemployment and limited public transportation options in these areas have resulted in barriers to health care and healthy choices for food. The environmental justice concerns (environmental risks, hazards, lack of investment, and presence of primarily minority populations) in the vicinity of these targeted areas has resulted in residents that are exposed to a disproportionate amount of environmental pollution.

Air pollution has been linked to many types of health conditions including lower birth rates, stroke, asthma and various forms of cancer. The Scorecard Pollution Information Site (scorecard.goodguide.com) provides information on the degree of pollution problems and toxic chemicals. For our region, Edgecombe and Halifax (60-70 percentile) and Nash (80-90 percentile) are among the "dirtiest/worst Counties in the US" (2002 rankings) regarding added cancer risk from hazardous air pollutants (HAPs). The HAP with the highest concentration to cancer risk in all five counties was diesel emissions. Four major rivers flow across the five-county Upper Coastal Plain region that comprise two major river basins. Some of the region's water bodies have been designated as "impaired" due to poor water quality based on reports from the NC Department of Water Quality. Some of the brownfield sites identified are located along these water bodies, many of which are also

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susceptible to contaminants from groundwater and stormwater runoff. Based on the following data, it is reasonable to link the increased incidence of these diseases to the region's Brownfields.

Table 5: UCP Region Health Statistics, 2007-2011

	Teen Pregnancies (Ages 15-19)	Infant Death Rates	Age-Adjusted Cancer Death Rates	Age-Adjusted Heart Disease Death Rate	Age-Adjusted Stroke Death Rate	Age-Adjusted Diabetes Death Rate
Edgecombe County	84.8	11.0	227.0	233.2	95.2	36.8
Halifax County	77.3	12.6	210.2	226.5	52.9	46.5
Nash County	65.5	10.2	186.9	187.5	48.4	24.2
Northampton County	68.0	7.4	196.0	195.0	43.0	33.2
Wilson County	76.9	8.6	211.8	183.3	44.4	30.0
North Carolina	55.3	7.8	179.7	179.3	46.0	22.0

Source: NC DHHS State Center for Health Statistics, NC Statewide and County Trends in Key Health Indicators

* Cancer, Disease of Heart and Diabetes rates per 100,000 population; Teen Pregnancies per 1,000 female residents; Infant Mortality per 1,000 live births.

As revealed above, in most cases these rates are higher than state levels and disproportionately higher among minority communities. For the same period, all death rates for African Americans were higher in all five counties: Infant Mortality from 9.9 in Northampton to 17.5 in Nash; Cancer from 205.5 in Nash to 252.9 in Wilson; Heart Disease from 192.5 in Wilson to 246.8 in Halifax; Stroke from 44.6 in Northampton to 102.1 in Edgecombe; and Diabetes from 42.3 in Nash to 65.4 in Halifax.¹

c. Financial Need

i. Economic Conditions

The economic conditions, already in decline due to the transformation of the manufacturing and agriculture industry sectors, were exacerbated from several natural disasters including Hurricanes Dennis and Floyd. The staggering loss of jobs in the region from these colliding events and lasting impacts has led to some of the highest unemployment numbers in the country. In addition, according to the US Department of Labor, Bureau of Labor Statistics, the average weekly wage for each of the region's counties falls well short of the NC average (NC - \$854, Edgecombe - \$657, Halifax - \$622, Nash - \$704, Northampton - \$613 and Wilson - \$774). Lastly, four of the five counties (Edgecombe, Halifax, Northampton and Wilson) are ranked as Tier One most economically distressed counties by the NC Department of Commerce (NC DOC) Development Tier Designations.² Under this designation system, Halifax County is ranked as the third most distressed county in the state.

What has resulted from the economic transformation is a socio/economic distress that has not shown improvement since before the economic decline started to substantially affect the region some 10 years ago. The region continues to deal with double-digit unemployment, a declining population due in part to an exodus of youths, poverty rates that are higher than state and national levels, lack of new employment opportunities and reduced overall health. Additionally, hundreds of vacant buildings and potentially contaminated sites exist throughout the region, as evidenced by our expansive inventory of Brownfields. The increasing poverty, unemployment and exodus of business emphasize the lack of financial resources that make it difficult for local governments to contribute substantial

¹ NC DHHS State Center for Health Statistics: "Selected Vital Statistics for 2011 and 2007-2011" and "2007-2011 NC Resident Race/Ethnicity-Specific Age-Adjusted Death Rates"

² The NC Department of Commerce Development Tier Designations are used by various state agencies for economic development funding programs available to rural communities.

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resources for Brownfields assessments and redevelopment. The UCP region is in dire need of this funding to continue to build on the success of their current grant awarded in 2011.

ii. Economic Effects of Brownfields

Unemployment remains extremely high in the UCP region with a 12.8% annual rate for 2012; the workforce continues to experience only marginal growth, and annual wages continue to lag considerably behind state levels. From 2000-2010, the region lost 12,433 jobs with over 10,000 of those jobs in the manufacturing sector.³ Job losses in manufacturing has impacted both our larger cities and smaller towns. Rocky Mount, the largest city in the Brownfields Coalition Partnership, lost 251 jobs in 2009 to plant closures in the city. The Town of Enfield, with a population of just 2,532, lost 95 manufacturing jobs in 2008 with the closure of Allegheny Wood Products.⁴ As recently as 2012, the region's economy was not showing the improvement experienced at the state and national levels. The NC Department of Commerce, Division of Employment Security reported 24 business closings in 2012 that impacted over 900 jobs in the UCP region. Seeing these figures, it should be no surprise that four of the region's five counties had a poverty rate that exceeded 20% as recently as 2012. Also left in the wake of this economic transformation are hundreds of potentially contaminated, vacant and dilapidated buildings that were once used for textile mills, lumber production, auto service stations and many other commercial, industrial and public uses. As a result, tax revenues have plummeted in many of the region's municipalities, with less income to spend on vital public services for businesses and communities. Overall, with a severe lack of business activity, lending and business opportunities, these municipalities have business climates that are virtually non-existent.

These poor living conditions, including high residential and commercial vacancy rates and hundreds of potentially contaminated sites, have forced many citizens to relocate from the region for better economic conditions, opportunities and health. Many African-Americans who still call the UCP region "home" have found new employment by starting their own businesses. Very telling is the region's higher percentage of black-owned firms and increase from 2002-2007. According to the 2010 U.S. Census, black-owned firms in the five counties ranged from 10.5% to 27.4% in 2002, and 16.6% to 31.9% in 2007. For North Carolina, this rate only increased from 8.1% in 2002 to 10.5% in 2007. This is encouraging, though according to a February 8, 2011 article for Voice of America (www.voanews.com), black-owned firms have far less gross receipts than white-owned firms and the majority (94%) are without paid employees. In addition, the article states, "black-owned businesses are more strongly represented in less-successful industries, like personal services."

2. Project Description and Feasibility of Success

a. Project Description

i. Project Description, Alignment with Plans, and Project Redevelopment

The UCPCOG, now in the final year of its current EPA assessment grant, has discovered that the need for assistance is substantially greater than was originally determined. However, we have developed a successful process where assessment dollars are resulting in positive impacts in the region. The UCPCOG project is governed by a Brownfields Coalition Partnership (BCP) consisting of 15 towns and cities and 3 counties. According to the 2010 U.S. Census, 13 of the 15 towns have populations that are under 10,000. Sites are carefully scrutinized before assessment dollars are used to ensure the best use of grant funds. The redevelopments, investments, and leveraged funds associated with our current projects would not have been possible without the current EPA award. The remaining funds

³ North Carolina Department of Commerce, Division of Employment Security, Employment and Wages NAICS

⁴ North Carolina Department of Commerce, Division of Employment Security, Announced Business Closings

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for our 2011 grant are already earmarked for projects and our expansive inventory demonstrates the need for the additional EPA funds we are requesting.

Our project, regional in its overall scope, will continue to target the Interstate 95, US Highway 301 and 258 corridor areas which connect the larger BCP member cities to the more remote areas of member counties and towns. As such, the project will continue to parallel goals of our local and regional land use and revitalization plans. In Rocky Mount, the Downtown Action Plan stresses the importance of public/private partnerships to help create an “investor ready climate”. Two sites that are located in the downtown target areas will be addressed using these funds: a Phase II ESA for the Quality Laundry site which is part of the planned Edgecombe Community College Biotech and Medical Simulation Center, and a Phase I/II at a former CSX loading dock which is planned as a place to showcase work from local artists. Additionally, a community survey and community input sessions conducted in 2013 during the update of the Town of Scotland Neck Land Development Plan showed overwhelming support to concentrate marketing efforts in the downtown with 83% of African-Americans agreeing on the conversion of a downtown building as a multi-use center for town residents and visitors. Also, one proposed strategic policy is for Scotland Neck to actively pursue the UCPCOG Brownfields redevelopment initiative. Lastly, the Patterson Mill Site in Roanoke Rapids, which received Phase I and II ESAs, is planned for a \$5 million redevelopment as a public recreation complex and will require cleanup planning and an EPA cleanup grant in order to reach the redevelopment stage. The draft Roanoke Rapids Comprehensive Plan recognizes the importance of aligning the city’s needs with its downtown and states “revitalization of the uptown/downtown historic district is a key to the viability of the entire community.”

The UCP region’s Comprehensive Economic Development Strategy (CEDS) 2012-2017 reflects the goals of the current and proposed brownfields assessment project in its *Goals, Objectives, Strategies and Actions* section where “older underutilized or vacant buildings” and the “brownfields assessment program” are identified as assets for identifying new adaptive capabilities. Additionally, the CEDS Action Plan items include the development of an inventory of vacant/underutilized structures and marketing of properties to lenders, realtors and developers. Finally, the Twin Counties Vision and Strategic Plan, newly adopted for the City of Rocky Mount and Nash and Edgecombe counties, has a broad-based vision and goals that include alignment of infrastructure investment and community development initiatives.

ii. Project Management Approach [5 points]

Areas designated for assessment have already been established by the UCPCOG through the Brownfields Coalition Partnership (BCP), and UCPCOG staff will continue efforts to expand the BCP. The Project Team consists of the BCP: UCPCOG staff member Joseph Gambaccini who has managed the UCPCOG brownfields project since its award in 2011; and, a qualified environmental consulting firm which will be retained within one month of award. The Project Team will continue to work together on development and maintenance of the site inventory; rank and prioritize sites using the existing site selection, and prioritization described in **iii. Site Selection** on page 7. During and following site selection the UCPCOG project manager will work closely with the environmental consulting firm to coordinate site access with property owners and other tasks associated with Phase I and Phase II environmental site assessments, including stakeholder meetings as needed throughout the assessment process. Additionally, the UCPCOG will hold annual meetings with the BCP to evaluate program progress, review the site inventory and recommend and prioritize additional sites for the program.

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iii. Site Selection

The UCPCOG has already identified over 30 sites that need immediate funding for Phase I and/or Phase II ESAs with already executed access agreements tied to 10 individual properties. We added 66 potential Brownfields in Rocky Mount and another 200 sites along corridors in the region that will be prioritized, ranked and assessed with these grant monies. The UCPCOG has been working from a successful framework which we anticipate will continue to produce successful results with the additional EPA funding. The UCPCOG utilizes the following selection criteria to identify potential petroleum and hazardous sites:

- Sites must be abandoned or underutilized and meet the Site Eligibility requirements for brownfield grant projects in the Guidelines for Brownfields Assessment Grants;
- Sites must have proposed redevelopment that would address needs of a community, town, city or county and have interest from developers and/or prospective businesses; and
- Sites must be potentially contaminated.

Sites with the most potential for impact to the economic needs, health and environment of a community will be favored. Since the UCPCOG communities are primarily served by groundwater wells, particular attention will be given to sites where groundwater is the primary source of drinking water. Once sites are selected, we will utilize ranking criteria to prioritize the sites for Phase I and II ESAs. These criteria include neighborhood economic condition, building condition, accessibility, neighborhood economic trend, neighborhood impact with assessment, nearby greenspace, environmental concern, brownfields proximity, surface water proximity and railroad proximity.

Once a site has been prioritized and selected for participation in the program, a Property Access Consent Agreement is executed between the property owner(s) and environmental engineering firm. The agreement allows the firm to access the site and conduct the necessary site work. The UCPCOG has already received signed agreements for many of the sites mentioned previously and other property owners are poised to submit executed agreements once funding is allocated for their site.

b. Task Description and Budget Table

i. Task Description

Task 1 – Community Involvement and Engagement

A staff member will be assigned as the community engagement coordinator. Two centrally-located community education workshops will be held annually to educate residents about brownfields and the effects on their neighborhoods. Community outreach sessions will also be held prior to Phase II work to inform residents of redevelopment ideas and allow for community discussion. These sessions will be held as Public Hearings at Boards of Commissioners meetings, community centers or churches, and will include discussions with the area Community Development Corporation (CDC). The team will also hold annual information sessions for lenders, developers and property owners; post periodic newspaper articles in four newspapers that cover the region; prepare quarterly newsletters detailing current events and program successes and distribute them to lenders, developers, community colleges, CDCs, Brownfields Coalition Partnership members and downtown development agencies; and hold annual BCP meetings.

The team estimates the community involvement and engagement efforts will cost \$37,000 (\$18,500 for hazardous substances and \$18,500 for petroleum substances). EPA funding will be used to cover costs for meeting coordination and preparation, supplies and travel. The Travel line item in the budget also includes EPA annual brownfields conferences. The UCPCOG staff will attend the annual EPA

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brownfields conference and estimates that the cost for one attendee to attend the annual national conference for the three-year grant period will be \$3,000 (\$1,000 per year for three years).

OUTPUTS: Hold 6 community engagement workshops, hold 3 informational sessions for developers, lenders and property owners; hold 8 Pre-Phase II community outreach sessions; prepare and distribute twelve (12) quarterly newsletters; post three newspaper articles annually in four newspapers; Hold four (4) Brownfields Coalition Partnership meetings.

Task 2 – Phase I ESAs

The UCPCOG has already completed a substantial amount of site inventorying and ranking activities allowing us to devote the majority of funding for Task 2 Phase I ESAs and Task 3 Phase II ESAs. We will use our ranking and prioritization process described in **iii. Site Selection** on page 7 as new properties are added to the site inventory. The UCPCOG project team estimates that twenty (20) Phase I ESAs will be conducted during the new three-year grant period. The team estimates a \$3,500 cost for each Phase I ESA for a total of \$70,000 (\$35,000 hazardous substances and \$35,000 petroleum substances). Phase I ESAs will be performed in accordance with EPA's All Appropriate Inquiries rule per 40 CFR Part 312 and the ASTM E1527-05/13 standards. This work will be subcontracted to a qualified environmental consulting firm to be selected through a qualifications-based selection process.

OUTPUTS: Conduct twenty (20) Phase I ESAs.

Task 3 – Phase II ESAs

The UCPCOG project team estimates that eight (8) Phase II ESAs will be conducted during the new EPA grant. The team estimates a \$31,000 cost per Phase II ESA for a total of \$248,000 (\$124,000 hazardous substances and \$124,000 petroleum substances). These Phase II ESAs will be performed in accordance with state and/or federal ESA standards and/or state UST standards for performing environmental assessments. They will be governed by site-specific Quality Assurance Plans and Health and Safety Plans that will receive prior EPA approval. The Phase II ESAs will focus on the nature and extent of contamination to determine cleanup alternatives and costs for redevelopment. Phase II ESAs will be conducted in accordance with the approved Health and Safety Plans.

OUTPUTS: Conduct eight (8) Phase II ESAs.

Task 4 – Cleanup Planning

The UCPCOG project team estimates that three (3) cleanup plans will be completed during the new three-year grant period. The team estimates a \$15,000 cost for each cleanup plan for a total of \$45,000 (\$22,500 hazardous substances and \$22,500 petroleum substances). One of these plans is slated for the Patterson Mill site in Roanoke Rapids. The governmental entity that owns the Patterson Mill site has authorized the UCPCOG to proceed with a cleanup plan once funds are available and plans to submit a subsequent cleanup application to EPA. The cleanup task involves conducting a feasibility study of remedial options and estimating cleanup costs based on redevelopment scenarios for sites where Phase II ESAs were conducted. The majority of this task will be conducted by the environmental consultant. Existing strategic plans and community engagement will guide redevelopment of these sites.

OUTPUTS: Complete three (3) cleanup plans.

ii. Budget Table

Table 6 indicates how EPA brownfields assessment funds will be used for Tasks 1-4 described above. The table includes separate budgets for hazardous and petroleum substances.

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Table 6: BUDGET

HAZARDOUS MATERIALS	Task 1 Community Engagement	Task 2 Phase I ESAs	Task 3 Phase II ESAs	Task 4 Cleanup Planning	Total
Personnel	\$8,000.00	\$5,000.00	\$5,000.00	\$1,600.00	\$19,600.00
Fringe	\$2,000.00	\$1,000.00	\$1,000.00	\$400.00	\$4,400.00
Travel	\$2,000.00	\$1,000.00	\$1,000.00	\$500.00	\$4,500.00
Supplies	\$500.00				\$500.00
Contractual	\$6,000.00	\$28,000.00	\$117,000.00	\$20,000.00	\$171,000.00
Other					\$0.00
Total	\$18,500.00	\$35,000.00	\$124,000.00	\$22,500.00	\$200,000.00

PETROLEUM	Task 1 Community Engagement	Task 2 Phase I ESAs	Task 3 Phase II ESAs	Task 4 Cleanup Planning	Total
Personnel	\$8,000.00	\$5,000.00	\$5,000.00	\$1,600.00	\$19,600.00
Fringe	\$2,000.00	\$1,000.00	\$1,000.00	\$400.00	\$4,400.00
Travel	\$2,000.00	\$1,000.00	\$1,000.00	\$500.00	\$4,500.00
Supplies	\$500.00				\$500.00
Contractual	\$6,000.00	\$28,000.00	\$117,000.00	\$20,000.00	\$171,000.00
Other					\$0.00
Total	\$18,500.00	\$35,000.00	\$124,000.00	\$22,500.00	\$200,000.00

Total Project Costs	\$37,000.00	\$70,000.00	\$248,000.00	\$45,000.00	\$400,000.00
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c. Ability to Leverage

The UCPCOG has been successful in leveraging resources during the first two years of the current assessment grant. Several types of resources have been utilized and are listed in Table 7 below:

Table 7: UCPCOG Brownfields Assessment Program - Leveraged Resources

Site	Location	EPA Fund Utilization	Leverage	Committed (Y or N)
Fawn Plastics	Middlesex	Phase I ESA	\$1.5 million private company	Y
Patterson Mill	Roanoke Rapids	Phase I & II ESAs	NC DENR Brownfields Program Agreement	Y
Rick's Country Store	Weldon	Phase I ESA	\$80,000 UCP Dev. Corp / US Department of Commerce RLF	Y
Littleton Library	Littleton	Phase I & II ESAs	\$433,065 NC Dept. of Commerce, CDBG Catalyst Award	Y
Middlesex Corporate Center	Nash County	Phase I ESA	\$10,000 2013 Duke Energy Progress Site Readiness Program	Y
Scotland Neck Senior Center	Scotland Neck	Phase I ESA	\$369,982 NC Dept. of Commerce, CDBG Catalyst Award	Y

Rocky Mount, the program's newest member, brings the potential for additional leveraging and other resources including developers. In recent years, the city has utilized brownfields funding for several major redevelopment projects including the Planter's Oil Mill, Imperial Centre and Douglas Block.

Again FY2014 EPA funding is sorely needed to complete assessment, cleanup planning and redevelopment work already started on the Garysburg Community Center, Middlesex Corporate

NARRATIVE PROPOSAL

Center, Patterson Mill, and Quality Laundry. We will continue to leverage the resources listed in Table 7 and expect to leverage additional resources through the following programs and agencies:

- U.S. Economic Development Administration: Public Works and Economic Assistance Program for infrastructure; Investing in Manufacturing Communities Partnership (IMCP) for “manufacturing communities” designation; and Planning and Technical Assistance;
- The NC Department of Commerce: Rural Development Division Programs; and Community Development Block Grant - Economic Development;
- US Dept. of Agriculture: Rural Business Enterprise Grant, Rural Business Opportunity Grant;
- The UCP Development Corporation in collaboration with the U.S Department of Commerce Revolving Loan Program to provide small businesses with loans through local banks;
- Roanoke Avenue Business Alliance, Rocky Mount Downtown Development and other revitalization non-profit groups in the region that foster economic development through economic development incentive grants, façade grants and technical assistance;
- NC DENR: NC Brownfields Program; and
- Environmental Protection Agency: Cleanup Grant Program.

The feasibility of success for this project is very high considering the current success of the UCPCOG Brownfields program and the magnified need which has resulted from successful community engagement and inventory activities. We have proven that the strategic use of assessment funds greatly increases the potential for leveraged funds, investment and redevelopment.

3. Community Engagement and Partnerships

a. Plan for Involving Community and Stakeholders and Communicating Project Progress

Community engagement has been an important component for the success of this program. Outreach meetings have been held since the program’s inception. UCPCOG staff has held information sessions for lenders, developers and property owners; posted newspaper articles; mailed quarterly newsletters, and held community outreach meetings where residents provided input to activities planned for various properties. Lastly, the team developed and distributed the UCPCOG Brownfields Program brochure by mail, at outreach meetings, and at the region’s 2013 Sustainability Summit “Can Sustainable Be Mainstream?”. Overall, the meetings and sessions have been well-attended with interested citizens asking questions and expressing concerns regarding the brownfields program.

The community engagement coordinator will lead the UCPCOG brownfields team in successfully carrying out our community engagement strategy. The team will annually hold two community education workshops, centrally-located in the five-county region, to educate residents about brownfields including the effects on their neighborhoods and to establish strong communication between neighborhoods, local governments and all partners regarding environmental justice to ensure equal health and protection from environmental risks. The team will also hold community outreach sessions prior to any Phase II work to inform residents of redevelopment ideas for a site and solicit community discussion. These sessions will be held as Public Hearings at Boards of Commissioners Meetings and/or at the community centers or churches depending on logistics and discussions with the area CDC. Partnering organizations will be in attendance at the education workshops and outreach sessions to assist with questions and depending on the site and issues involved will make presentations. Additionally, the team will hold annual information sessions for lenders, developers and property owners; post periodic newspaper articles in four newspapers that cover the region; prepare quarterly newsletters detailing current events and program successes and distributing the newsletters

NARRATIVE PROPOSAL

to lenders, developers, community colleges, CDCs, Brownfields Coalition Partnership members and downtown development agencies; and hold annual Brownfields Coalition Partnership meetings.

We have discovered during the current brownfields award that we need even greater contributions from partners in order to effectively reach out to the numerous communities in this expansive five-county region. As such, the UCPCOG is expanding its partnership with area CDCs. These include the Choanoke Area Development Association which covers Halifax and Northampton counties and the Rocky Mount/Edgecombe CDC which covers Rocky Mount and Nash and Edgecombe counties. Other “grassroots” groups that will participate in more of an advisory role regarding environmental risks include the Pamlico-Tar River Foundation and Roanoke River Basin Association. Lastly, the Roanoke Avenue Business Alliance, Tri-County Industries and the Rocky Mount Area Chamber of Commerce will assist with issues regarding economic development. The role for each community organization is detailed in the **Partnerships with Community Organizations** section on page 11.

b. Partnerships with Government Agencies

i. Local/state/tribal environmental and health agencies

NC Department of Environment & Natural Resources (NCDENR) - NC Brownfields Program will be used by prospective developers that need liability protection and tax incentives in order to help spurn redevelopment. The Roanoke Rapids Graded School District entered into an agreement with NCDENR for the Patterson Mill site during the current EPA assessment award.

Health Departments of the region’s five counties will attend community outreach sessions and Brownfields Coalition Partnership meetings as needed to provide information on public health issues in areas potentially impacted by brownfields.

ii. Other relevant federal, state and local government agencies

The **Halifax County Economic Development Commission (EDC)** and **Northampton County Economic Development Commission (EDC)** provide their respective counties with business development. Each EDC will attend BCP Meetings to advise on matters pertaining to their respective counties as they relate to economic development. Each EDC will continue to assist with site selection and prioritization and will work with property owners to get property access agreements signed.

The **Carolinas Gateway Partnership (CGP)** is a public-private industrial recruitment agency for Nash and Edgecombe counties. The CGP will continue to work with the UCPCOG and Nash County to identify sites with high potential for redevelopment and utilize ESAs as a tool as it markets properties to relocating and expanding businesses and developers. The CGP is currently marketing the Middlesex Corporate Center, which received Phase I ESAs as part of our initial grant.

The **Brownfields Coalition Partnership (BCP)** consists of 18-member towns, cities and counties of the UCP region and it continues to grow. Members will continue to identify and prioritize sites for assessment and redevelopment. Members will also assist as needed with community engagement by notifying residents about education workshops and outreach sessions and provide a facility for the meetings if needed. The BCP will also assist with execution of property access agreements.

c. Partnerships with Community Organizations

Support letters for all organizations listed below are attached.

The **Choanoke Area Development Association (CADA)** determines community needs and issues and facilitates programs to help residents in Halifax and Northampton counties become more self-

NARRATIVE PROPOSAL

sufficient. CADA will work with the UCPCOG to notify communities about the education sessions and outreach meetings to be held. CADA will help facilitate these meetings as needed. CADA will also help to inform residents about sites in their neighborhoods that are potentially contaminated.

The **Rocky Mount/Edgecombe Community Development Corporation (RMECDC)** works with small and minority business entrepreneurs, youth and adults at community resource centers, and is involved with activities that enhance cultural development. RMECDC will notify neighborhood residents regarding adjacent properties being assessed and assist the UCPCOG in notifying residents of meetings held for properties in their respective areas to gain community input.

The **Pamlico-Tar River Foundation (PTRF)** is a private, non-profit organization that monitors and protects the Tar-Pamlico River by providing its communities with education, advocacy and research of the river's health. The organization will assist the UCPCOG with identifying brownfields that are hazards to the river basin and attend outreach sessions to educate communities and other partner organizations on the environmental threats to the health of the river.

The **Roanoke River Basin Association (RRBA)** is a citizen advocacy group dedicated to the preservation and enhancement of the Roanoke River. The RRBA will educate basin communities about the natural resources of the basin as well as potential impacts to its health. RRBA will also advise the UCPCOG and Brownfields Coalition Partnership on potential water quality impacts and on reducing the risk for contamination of the Roanoke River.

The **Roanoke Avenue Business Alliance (RABA)** is a non-profit corporation with the purpose of improving the quality of life for residents of the City of Roanoke Rapids by increasing economic activity and employment in the Roanoke Business District. RABA has agreed to provide the UCPCOG assistance with marketing brownfields sites. RABA will also assist by meeting with developers and businesses interested in various sites.

Tri-County Industries (TCI) is a non-profit that offers vocational assessment, work training, and job placement services to disadvantaged or disabled residents of the UCP region's five counties. The organization will coordinate these services with the UCPCOG to make them readily available to communities as jobs are created as a result of the brownfields project.

The **Rocky Mount Area Chamber of Commerce** is a membership association that represents the interests of local businesses and over 145,000 residents of the City of Rocky Mount and Nash and Edgecombe counties. The Chamber will assist the UCPCOG with the identification and marketing of properties with high potential for redevelopment.

4. Project Benefits

a. Health and/or Welfare and Environment

From a broad perspective, the benefits associated with this grant include job creation, increased tax base, revitalization of vacant underutilized buildings, removal of contaminants, and a healthier environment resulting in healthier citizens. However, we think the positive outcomes of our current efforts paint a more comprehensive and realistic picture of the anticipated outcomes/benefits for our project: new plant constructed on 5.36 acres, 10 jobs created and tax base increased with the Fawn Plastics redevelopment in Middlesex; identification and removal of a documented groundwater contaminant source in an area where groundwater is used for drinking in Enfield; the 23.5 acre Patterson Mill site slated for redevelopment as a recreational complex, resulting in jobs, recreational

NARRATIVE PROPOSAL

opportunities, and community revitalization in Roanoke Rapids. We have a plan and a proven track record of obtaining benefits from use of these grant funds.

With additional EPA funding, the UCPCOG brownfields project will continue to result in the reduction of vacant and/or underutilized buildings with, or having the potential for, contaminants leading to healthier lives of residents living adjacent to these sites. The ESAs and ensuing cleanup and redevelopment will also improve community perception regarding brownfields and redevelopment in their neighborhoods. The removal of blighted and unsightly buildings will also increase community morale, resulting in a more positive outlook for the community. The reduced exposure to environmental risks will ultimately contribute to a reduction in the region's higher than average death rates. Lastly, the increase in employment opportunities and investment will help to reduce poverty and increase options to better meet the transportation needs of our numerous rural communities.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

i. Use of planning, policies, ordinances

The region's **Comprehensive Economic Development Strategy 2012-2017 (CEDS)** is centered on principles and standards from HUD, EPA, DOT and EDA including environmentally sustainable development, leveraging of federal policies and investments, and valuing communities and neighborhoods. Energy and sustainability are also a vital part of the CEDS and include the following Actions: promote and expand "Green" housing opportunities encouraging the use of green building techniques; develop energy efficiency as an economic development tool; and develop partnerships between community colleges and businesses for sustainability and energy programs training. In addition, many BCP members have plans that stress the importance of reusing existing infrastructure in the downtowns. While two of the plans are currently in draft form, they illustrate the mindset of communities as they look toward their respective futures. The **Rocky Mount Downtown Action Plan** calls for smart growth as part of redevelopment; the **Scotland Neck Land Development Plan**, to be adopted in 2014, has proposed a policy for the Town to "actively continue downtown revitalization" and include mixed-use development, pedestrian amenities and other smart growth techniques; and the draft **Roanoke Rapids Comprehensive Plan** recognizes the importance of the downtown and states "revitalization of the uptown/downtown historic district is a key to the viability of the entire community."

ii. Example of planning efforts to integrate equitable development

UCPCOG staff is working with the Town of Scotland Neck on the NC Department of Commerce Small Business Entrepreneurial Assistance (SBEA) Grant Project. One project activity is to work with the community to help create an environment that fosters entrepreneurship. During 2014, UCPCOG staff will coordinate with Halifax Community College, Halifax County Economic Development Commission and Scotland Neck Business Association to hold education workshops for aspiring entrepreneurs, public school students and others in the community. The workshops will stress the importance of entrepreneurship for the local economy.

c. Economic or non-Economic Benefits (long-term benefits)

i. Economic benefits

Many opportunities were established through site assessments and partnerships established during the first two years of the UCPCOG Brownfields Assessment program. Projects in Enfield, Middlesex and Weldon resulted in job creation and retention (20 initially with 25 projected long-term), increased tax base for each of the three municipalities, and increased potential for business expansion. Additional opportunities for redevelopment in the region are already being planned, but funding is needed to

NARRATIVE PROPOSAL

assess environmental issues at each site. The Garysburg Community Center will include development of a health clinic and library and will also be the location for summer camp and community-related activities. The project will also create 5 jobs. In addition, two properties located in Rocky Mount associated with the Edgecombe Community College Biotech project have been identified for Phase I and II assessments. 100 jobs will be created for this project along with \$12 million in private investment. This project will also result with a workforce trained for higher-paying jobs. Also, the Middlesex Corporate Center, which received Phase I ESAs on its nine parcels, is one step closer to redevelopment as a result of the 2013 Duke Energy Site Readiness Study. Middlesex Powell Clinic of Nash Health Care System was the first business to locate in the Middlesex Corporate Center with more companies to follow after required Phase II work occurs.

ii. Planned efforts for local hiring
UCPCOG will partner with the Turning Point Workforce Development Board (TPWDB) and Tri-County Industries (TCI) to develop job training and employment initiatives for low-income, minority and/or disadvantaged residents of communities potentially impacted from hazardous sites. Residents will receive the necessary training so that they can secure full-time positions. TPWDB, TCI and UCP staff will also publicize employment opportunities including notifying CDCs as sites enter the cleanup and redevelopment stages of the overall process.

5. Programmatic Capability and Past Performance

a. Programmatic Capability

The UCPCOG has effectively managed both federal and non-federal grants. During the past 10 years, the agency has successfully managed over \$40 million in grants for the five-county region. These include grants from the U.S. Department of Commerce - Economic Development Administration, U.S. Environmental Protection Agency, U.S. Department of Agriculture - Rural Development, NC Department of Commerce, NC Department of Environment and Natural Resources (NCDENR), NC Clean Water Management Trust Fund, NC Rural Economic Development Center, NC Department of Transportation, NC Golden LEAF Foundation, and the NC Department of Cultural Resources. The UCPCOG grant management duties include project tracking and accounting, performance measurements, reporting (monthly, quarterly, semi-annual, annual and final), and compliance reporting of performance standards with state and federal agencies.

The UCPCOG management team has the proven programmatic capability to manage another EPA Community-wide Assessment Grant. The team consists of UCPCOG staff from Planning and Development Services, Administration, and Finance Department. Joseph Gambaccini, Project Coordinator under the current EPA brownfields cooperative agreement, has worked full-time with the UCPCOG for three years and has 13 years experience in project administration including 10 years in economic development. He is well-qualified to continue leading the team pending additional EPA brownfields assessment funding and Mr. Dennis Patton, an UCPCOG staff member integral in putting the initial application together, serves as his assistant project manager and backup. Joseph's responsibilities include coordination of site selection/prioritization, environmental site assessments, community outreach, and economic development activities. Mr. Gambaccini also administers quarterly and semi-annual reports, MBE-WBE semi-annual reports and submits data to the EPA Assessment Cleanup and Redevelopment Exchange System (ACRES). Mark Hill, Finance Director is responsible for financial administration including budgeting, processing of payrolls and drawdown of funds through the federal Automated Standard Application for Payments (ASAP) system. Joseph Dooley, UCPCOG contractor, will provide expertise in project administration and contract law.

NARRATIVE PROPOSAL

b. Audit Findings

The UCPCOG maintains an exemplary record of federal and non-federal grant management. There have been no adverse audit findings. The UCPCOG Planning and Development Services Department has been involved with numerous federal assistance programs and for each has complied with procurement, progress and annual reporting, requisitions and financial requirements.

c. Past Performance and Accomplishments

i. Currently or Has Ever Received an EPA Brownfields Assessment Grant

1. Compliance with grant requirements

The UCPCOG continues to administer the \$400,000 EPA Brownfields Assessment cooperative agreement #95482811-0 awarded in September 2011. To date, the UCPCOG team remains in compliance with the work plan, schedule and terms and conditions of the grant. All quarterly, MBE/WBE (semi-annual) and annual reports including an annual projection of environmental site assessments were submitted on time to state and/or federal agencies as required. Additionally, timely updates were made to the ACRES database upon completion of Phase I and/or Phase II environmental site assessments or when other significant brownfields activities occurred within a given quarter. While we have made sufficient progress during the current EPA grant, additional EPA assessment and cleanup planning funding will be needed to complete the work necessary on sites already identified as high priority and other sites that will receive prioritization as the program progresses. Approximately \$100,000 of funds remain as of December 30, 2013 from the current \$400,000 EPA assessment grant. Additional work is already being planned for the following sites: Garysburg Community Center Phase II for an existing heating oil UST; Middlesex Corporate Center Phase II for several parcels previously used for landfill and auto salvage; Patterson Mill cleanup plan; and Quality Laundry Phase II in Rocky Mount as part of the Edgecombe Community College Bio Tech and Medical Simulation Center project.

2. Accomplishments

The specific outcomes and outputs of our current project are vast, and our successes have only resulted in a program that is growing and in desperate need of continuing funds. Specific outcomes and outputs include 15 Phase I ESAs, 3 Phase II ESAs, 1 cleanup plan in the works, 6 outreach meetings held involving community residents, developers, lenders, realtors and Brownfields Coalition Partnership (BCP) members, 3 mailings of the UCPCOG brownfields program newsletter, 5 new BCP members, 20 jobs created, 521-acres assessed, \$7.4 million leveraged, and \$6.5 million in planned redevelopment. The ACRES database was updated and reflects the accomplishments for each project. Although the number of completed ESAs is below the projected numbers in our work plan, the quality of the assessments and subsequent outputs have far outpaced our expectations. A large amount of funding went into the three Phase II ESAs, but the benefits of each have been tremendous. The success of this program in the first two years has been due to our ability to mobilize funding and respond quickly in our smaller communities. An example was in the Town of Middlesex where Pencco, Inc. was interested in a portion of the Fawn Plastics site to expand their operations. The company and Middlesex were on a tight timeline and an initial assessment needed to be performed quickly in order for Pencco to make a determination on this UCP region site or a site in another region. Similarly, the planned \$5 million Patterson Mill redevelopment would not have come to fruition without the ESA activities that properly characterized the environmental condition of this former textile plant. This opportunity came about as a result of tireless community outreach conducted by the UCPCOG.

THRESHOLD CRITERIA

1. Applicant Eligibility: The Upper Coastal Plain Council of Governments, as the applicant, is a consortium of five counties headquartered in Wilson, North Carolina. This council of governments agency is an eligible grant applicant as a "local Government" defined under 40 CFR part 31.
2. Letter from the State or Tribal Environmental Authority: A letter of support for this application was requested and received from the North Carolina Department of Environment and Natural Resources (NC DENR). The letter acknowledges and supports the UCPCOG application for EPA funds to conduct assessment activities (see Attachments).
3. Community Involvement: The UCPCOG intends to inform and involve the community and other stakeholders using many different techniques. Soon after receiving an EPA award, the UCPCOG will hold a community education workshop, centrally-located in our five-county region. At this workshop, we will educate residents and other partnering organizations including CDCs, the region's Chambers of Commerce and Economic Development Commissions on the effects of brownfields and purpose of the brownfields program. The UCPCOG will also hold community outreach sessions prior to Phase II ESAs to inform residents of redevelopment ideas and solicit community discussion. CDCs will aid the UCPCOG with notifying communities about the workshops and outreach meetings. Partnering organizations will be in attendance at the education workshops and outreach sessions to assist with questions and make presentations when needed. Additionally, the team will hold annual information sessions for lenders, developers and property owners; post periodic newspaper articles about the brownfields program in the region's newspapers; and prepare and distribute quarterly newsletters to communities and other stakeholders detailing current events and brownfields program successes.

The UCPCOG community-wide assessment narrative proposal provides additional details about the activities planned for community involvement.

4. Site Eligibility and Property Ownership Eligibility: The UCPCOG application is for a community-wide assessment grant; this criterion does not apply.

ATTACHMENTS

- Letter from the State or Tribal Environmental Authority
- Choanoke Area Development Association (CADA)
- Rocky Mount/Edgecombe Community Development Corporation (RMECDC)
- Pamlico-Tar River Foundation (PTRF)
- Roanoke River Basin Association (RRBA)
- Roanoke Avenue Business Alliance (RABA)
- Tri-County Industries (TCI)
- Rocky Mount Area Chamber of Commerce



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

January 3, 2014

Joseph Gambaccini
Economic Development Specialist
Upper Coastal Plain Council of Governments
121 West Nash Street
P.O. Box 9
Wilson, NC 27894

Re: U.S. EPA Brownfields Assessment Grant Application – UCPCOG

Dear Mr. Gambaccini:

The Brownfields Program wholeheartedly supports your application to obtain a community-wide brownfields assessment grant for both petroleum and hazardous substances. We know that the UCPCOG is well prepared as an agent of grant management infrastructure for the rural towns in an underserved part of the state. We are aware of the strong history of rural manufacturing in your region that has suffered severe economic strain with both rising poverty and high unemployment. We have attended outreach meetings with your brownfields team and are impressed with your efforts at building a team of towns and cities in your rural 5-county region. We believe you are well positioned for efficient use of these grant funds.

As you know, the NC Brownfields Program stands ready to assist your local prospective developers of brownfields properties to obtain a brownfields agreement in order to receive technical assistance on assessment, cleanup, liability relief and tax incentives. Through the program such prospective developers will find that a brownfield agreement can break barriers to project financing on environmentally impacted properties. These liability protections and other incentives offered by the NC Brownfields Program may help attract brick-and-mortar developers to your local brownfields opportunities and we would be glad to continue to provide outreach and education to your local stakeholders towards this end.

It is part of our mission to help your brownfields redevelopment team take advantage of what we have to offer. Your proactive efforts to contact us to do just that are appreciated. We wish you success in being awarded grant funds. However, regardless of whether you win such an award or not, we look forward to working with you on this project to revitalize your community through the Brownfields Program.

Sincerely,

Bruce Nicholson
Brownfields Program Manager
Bruce.Nicholson@ncdenr.gov

cc: David Champagne, U.S. EPA Region 4



Choanoke Area Development Association of North Carolina Inc.

Post Office Box 530 * Rich Square, North Carolina 27869

Telephone: 252.539.4155 * Fax: 252.539.2048

www.nc-cada.org

January 15, 2014

Joseph Gambaccini
Economic Development Specialist
Upper Coastal Plain Council of Governments
121 West Nash Street, P.O. Box 9
Wilson, NC 27893

RE: Brownfields Community-Wide Assessment Grant Program

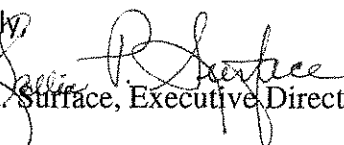
Dear Mr. Gambaccini:

Choanoke Area Development Association of NC, Inc. (CADA) appreciates the efforts of the Upper Coastal Plain Council of Governments (UCPCOG) Brownfields Assessment Program to apply for additional EPA funds for environmental assessments, planning and redevelopment of old and abandoned commercial and industrial buildings in Halifax and Northampton counties. The use of this funding will benefit local residents by reducing the risk of exposure to hazardous chemicals, increasing job opportunities and improving the appearance of former industrial properties that located in our communities.

It is important for our residents to be engaged as these brownfields activities occur, and this is where we can help. CADA, designated as a Community Action Agency, engages with local communities to determine local needs and issues that directly affect poverty. As part of our efforts, we form partnerships and facilitate programs that help enable communities to become more self-sufficient. The Upper Coastal Plain region is a considerably large area including five counties; therefore it will certainly require assistance through partnerships with additional organizations in order to provide its citizens with the most effective results from this brownfields grant program. CADA can provide assistance with educating communities about potential brownfield sites located in or near their neighborhoods, including potential environmental risks, and assistance provided by the brownfields program. CADA is also available to attend Brownfields Coalition Partnership meetings to learn about the brownfields program and ongoing projects in other communities.

CADA is committed to partnering with the UCPCOG Brownfields Assessment Program to actively engage our communities with the brownfields and redevelopment process. Please feel free to contact me with any questions at (252) 539-4155.

Sincerely,


Sallie P. Surface, Executive Director

An Equal Opportunity Employer / An Equal Opportunity Agency



Rocky Mount/Edgecombe Community Development Corporation
148 South Washington Street • Harambee Square • Suite 103
P.O. Drawer 1477 • Rocky Mount, North Carolina 27802-1477
(252) 442-5178 • FAX: (252) 442-1675



Business Development Center
(252) 442-8364

Housing Development Center
(252) 442-8553



December 18, 2013

Mr. Joseph Gambaccini
Economic Development Specialist
Upper Coastal Plain Council of Governments
121 West Nash Street
P.O. Box 9
Wilson, NC 27893

RE: 2014 UCPCOG EPA Brownfields Community-wide Assessment Grant

Dear Mr. Gambaccini:

The Rocky Mount/Edgecombe Community Development Corporation (RMECDC) fully supports the Upper Coastal Plain Council of Governments (UCPCOG) \$400,000 application to the 2014 EPA Community-wide Assessment Grant program. We are committed to partnering with the UCPCOG and other stakeholders to inform residents of the City of Rocky Mount and Nash and Edgecombe counties of potential environmental issues concerning their neighborhoods and to educate residents about the brownfields assessment grant program.

It is our understanding that community involvement and engagement is an important component of the brownfields assessment grant. RMECDC provides communities in our service area with services for small and minority business entrepreneurs, housing counseling, development of affordable housing, foreclosure mitigation, neighborhood revitalization, job creation, and activities that enhance cultural development. We will be available to assist you with community engagement activities for the brownfields assessment project as follows:

- Notify neighborhood residents regarding adjacent property under consideration for environmental site assessment work and potential redevelopment;
- Notify residents about community outreach sessions to be held for properties planned for redevelopment so that they can learn about and respond to current and planned brownfields activities;
- Present community questions and concerns regarding potential brownfields sites to UCPCOG brownfields project staff; and
- Attend the UCPCOG Brownfields Coalition Partnership meetings to learn about brownfields activities occurring throughout the five-county region.

Again, we are fully committed to partnering with the UCPCOG with this effort. Please do not hesitate to contact me at 252-442-5178 or rmecdc@embarqmail.com.

Sincerely,

A handwritten signature in cursive script that reads "Joyce M. Dickens".

Joyce M. Dickens
President/CEO



Pamlico-Tar River FOUNDATION

January 3, 2014

Joseph Gambaccini
Economic Development Specialist
Upper Coastal Plain Council of Governments
121 West Nash Street, P.O. Box 9
Wilson, NC 27893

RE: FY 2014 EPA Community-wide Brownfields Assessment Grant Application

Dear Mr. Gambaccini,

The Pamlico-Tar River Foundation (PTRF) fully supports the Upper Coastal Plain Council of Governments (UCPCOG) application for EPA Community-wide Brownfields Assessment Grant funds. These grant funds would enable the UCPCOG brownfields site assessment program to continue its efforts to help improve the environment for residents in 18 of the region's towns, cities and counties by assessing and cleaning-up abandoned or under-utilized properties.

PTRF is a grassroots organization committed to protecting, preserving and promoting the Tar-Pamlico River and its watershed. Our organization stands ready to assist the UCPCOG Community-wide Brownfields Assessment Grant program and its efforts in the region by helping to identify potential brownfields properties that are considered the most hazardous for our river basin. We look forward to working with the UCPCOG Brownfields Coalition Partnership to help identify brownfield properties, and assist with cleanup planning to ensure potential impacts to water quality are properly addressed. We will also be available to advise communities on matters pertaining to the watershed.

Again, the Pamlico-Tar River Foundation would like to assist the UCPCOG Brownfields Assessment Program to ultimately improve the health and quality of life for residents of the region. Please contact me if you need any additional information.

Sincerely,

R. Harrison Marks, III
Executive Director



Monitoring, Protecting & Enhancing the River Since 1981

PO Box 1854 ~ Washington, NC 27889 ~ (O) 252-946-7211 ~ (F) 252-946-9492
(E) info@ptrf.org ~ www.ptrf.org ~ www.facebook.com/pamlicotar

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Roanoke River Basin Association

150 Slayton Avenue- Danville, VA 24540- (434) 250-1185



January 6, 2014

*"The Voice for the
Development, Use, Preservation and Enhancement
of Roanoke River Basin Resources"*

Joseph Gambaccini
Economic Development Specialist
Upper Coastal Plain Council of Governments
121 West Nash Street
P.O. Box 9
Wilson, NC 27893

RE: 2014 UCPCOG Brownfields Site Assessment Grant Application to EDA

Dear Mr. Gambaccini,

On behalf of the Roanoke River Basin Association (RRBA) please accept this letter of support for the Upper Coastal Plain Council of Governments (UCPCOG) application for a 2014 EPA Brownfields Assessment Grant to assess hazardous and petroleum substances and plan for cleanup. We applaud UCPCOG's efforts to address potential environmental hazards in the region particularly along the Roanoke River.

RRBA is an all-volunteer citizen advocacy group with the mission to administer a strategy for the development, use, preservation and enhancement of the Roanoke River basin and its resources. We believe that protection of water resources and management of economic growth are essential for both the environment and the economic vitality of the basin and the Upper Coastal Plain region. The Roanoke River Basin Association is available to assist the UCPCOG Brownfields Assessment Program to reduce the risk for contamination along the Roanoke River. RRBA will work with the UCPCOG to insure that potential water quality impacts from urban and agricultural runoff to the Roanoke River are addressed. RRBA will also educate residents of basin communities about the basin and its resources.

We are excited about the opportunity to partner with you on this project. Please feel free to contact me if you have any questions.

Sincerely,

Andrew Lester
Executive Director
Roanoke River Basin Association

Roanoke Avenue Business Alliance

==The Road to Success="The Avenue"==

Board of Directors

Carol Moseley
President

Titus Workman
Vice-President

Kim Simpson
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Janet Dixon
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City Liaison

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Dr. Ervin Griffin

Yvonne Doughtie

Charles Tillery

Pat Wilkie

Main Street Director

Sherry Hux

December 20, 2013

Joseph Gambaccini
Economic Development Specialist
Upper Coastal Plain Council of Governments
121 West Nash Street
P O Box 9
Wilson, NC 27893

RE: UCPCOG Brownfields Assessment Grant Application

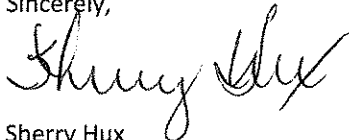
Dear Mr. Gambaccini,

The Roanoke Avenue Business Alliance (RABA) fully supports the Upper Coastal Plain Council of Governments (UCPCOG) EPA Brownfields Assessment Grant application of \$400,000. We feel that these grant funds are necessary to expand on an already successful brownfields program that helps to create opportunities for redevelopment of vacant buildings in our region. We feel that this funding is greatly needed to benefit the business community here in the City of Roanoke Rapids since it would lead to much-needed job creation and help to increase our downtown commercial inventory available for local entrepreneurs and businesses interested in relocating or expanding to Roanoke Rapids.

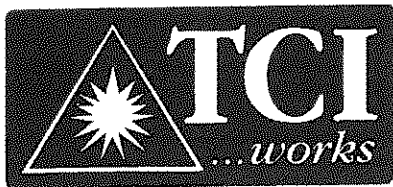
RABA acts as the lead agency for the Roanoke Rapids Main Street Program which helps to enhance downtown revitalization through partnership-building, marketing and economic restructuring. That being said, RABA may provide the UCPCOG Brownfields program with marketing of sites, meeting with prospective developers/businesses interested in development within our District.

Again, RABA supports the UCPCOG Brownfields Assessment Grant Application and looks forward to partnering with the UCPCOG. Please contact me if you have any questions or need additional information.

Sincerely,



Sherry Hux
Main Street Director
Roanoke Avenue Business Alliance



1250 Atlantic Avenue
Rocky Mount, NC 27801
(252) 977-3800
Fax: (252) 977-2283
www.tciworks.com

Brenda P. Cogdell
President

January 10, 2014

Joseph Gambaccini
Economic Development Specialist
Upper Coastal Plain Council of Governments
121 West Nash Street
P.O. Box 9
Wilson, NC 27893

RE: FY2014 EPA Brownfields Community-Wide Assessment Grant Application

Dear Mr. Gambaccini,

Tri-County Industries (TCI) supports the Upper Coastal Plain Council of Governments (UCPCOG) application to the EPA Brownfields Program to assess sites and buildings for contamination and begin the process for cleanup and redevelopment. If awarded, this grant would result in reduction of slum and blight in our communities and increased opportunities to get disadvantaged people back into the region's labor force.

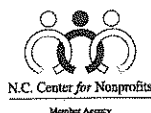
TCI is a non-profit organization that provides vocational services for individuals of the five-county Upper Coastal Plain region who are disabled and/or disadvantaged. Our rehabilitation program provides trainees with assessment, work training and job placement. We are available to work with the UCPCOG and Brownfields Coalition Partnership to provide these job training and placement services to prospective workers as job opportunities are created through implementation of the EPA brownfields grant.

In final, TCI is eager to partner with the UCPCOG and Brownfields Coalition Partnership to help our residents find employment and develop a renewed sense of self-worth.

Sincerely,

A handwritten signature in black ink that reads "Brenda P. Cogdell".

Brenda P. Cogdell
President



AS 9100C Registered
ISO 9001: 2008 Registered
*Accredited by CARF for Comprehensive Vocational Evaluation Services,
Employee Development Services, and Community Employment Services.*



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Poyner Spruill LLP
Providence Bank
Southern Bank
Suddenlink Communications
WebPoint IT Solutions

January 9, 2014

Joseph Gambaccini
Economic Development Specialist
Upper Coastal Plain Council of Governments
121 West Nash Street
P.O. Box 9
Wilson, NC 27893

Dear Mr. Gambaccini,

The Rocky Mount Area Chamber of Commerce would like to offer its support for the Upper Coastal Plain Council of Governments (UCPCOG) EPA grant application of \$400,000 to continue their Brownfields Environmental Site Assessment and Cleanup Planning program. We applaud the continuing commitment of the UCPCOG to overcome the economic obstacles facing our rural communities.

The Rocky Mount Area Chamber of Commerce represents the interests of over 145,000 residents in the Twin County region which includes the City of Rocky Mount and Edgecombe and Nash counties. The residents of our region and millions of visitors traveling through North Carolina along I-95, 301, 64 and 258 witness unsightly, abandoned and potentially contaminated sites. We desire and envision a cleaner and more visually attractive environment with additional opportunities for our residents and visitors. With the help of the EPA Community-wide Assessment Grant, stakeholder commitment, and public/private interests in redevelopment opportunities, our abandoned brownfield sites can at last be cleaned up and redeveloped.

The Rocky Mount Area Chamber of Commerce will be available to help the UCPCOG identify properties for the brownfields program that have high potential for redevelopment. In addition, we will advise the Brownfields Coalition Partnership on promoting vacant commercial properties as the brownfields program ultimately helps to improve the marketability of these potentially contaminated sites.

The UCPCOG and Brownfields Coalition Partnership and its member towns, cities and counties can count on the Rocky Mount Area Chamber of Commerce to assist with the EPA brownfields program so that maximum benefit is achieved for the region. Please do not hesitate to contact me if you have any questions.

Sincerely,



Theresa M. Pinto
President
Rocky Mount Area Chamber of Commerce

Other Factors Checklist

Name of Applicant: Upper Coastal Plain Council of Governments

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
x	Community population is 10,000 or less	6
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	
	Project is primarily focusing on Phase II assessments.	
x	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation	10
x	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions.	5
	Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, <u>applicant must attach documentation</u> which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
	Community is implementing green remediation plans.	
	Climate Change (also add to "V.D Other Factors")	